

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROBERT MICHAELSON OF ADVISORY  
TRUST GROUP, LLC, IN HIS CAPACITY  
AS DEBTOR REPRESENTATIVE AND  
LIQUIDATING TRUSTEE,

Plaintiff,

Case No. 1:20-cv-01465-MN

v.

PETER BARONOFF, KEITH REUBEN,  
BRIAN DUNN, DAVID ARMSTRONG,  
JAMES HOPWOOD, RICHARD GOLD,  
BRYAN DAY, STAN GRABISH, RICHARD  
COHEN, STEVEN HELLAND, MALINDA  
BARONOFF, SHANNA BARONOFF, and  
JOHN DOES 1-100,

Defendants.

**THE BARONOFF DEFENDANTS' MOTION  
TO TRANSFER VENUE OR, ALTERNATIVELY, TO DISMISS**

Defendants Peter Baronoff, Malinda Baronoff, and Shanna Baronoff (together, the “Baronoff Defendants”), by and through undersigned counsel, move the Honorable Court to transfer venue of this civil action to the United States District Court for the Southern District of Florida pursuant to 28 U.S.C. § 1404 and 28 U.S.C. § 1412, or, alternatively to dismiss the Counts V, XII and XV of the Complaint filed by Plaintiff Robert Michaelson of Advisory Trust Group, LLC, in His Capacity as Debtor Representative and Liquidating Trustee pursuant to Federal Rule of Civil Procedure 12(b)(6). The grounds for this motion are fully set forth in the Opening Brief filed contemporaneously herewith.

Date: February 19, 2021

**SULLIVAN HAZELTINE ALLINSON LLC**

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